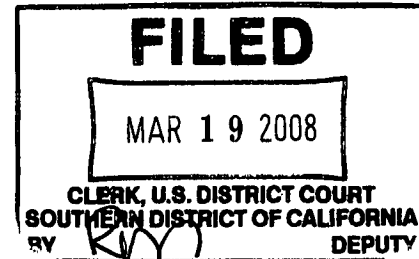


SUIHUAN CAO  
A38-494-554  
San Diego Detention Center (CCA)  
P.O. Box 439049  
San Ysidro, CA 92143-9049



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

SUIHUAN CAO,  
[A38-494-554]

Petitioner,

v.

MICHAEL CHERTOFF, SECRETARY OF THE  
DEPARTMENT OF HOMELAND SECURITY,  
MICHAEL MUKASEY, ATTORNEY GENERAL,  
ROBIN F. BAKER, DIRECTOR OF SAN DIEGO  
FIELD OFFICE, BUREAU OF IMMIGRATION  
AND CUSTOMS ENFORCEMENT, JOHN A.  
GARZON, OFFICER-IN-CHARGE,

Respondents.

Civil Action No. \_\_\_\_\_

**'08 CV 0511 DMS BLM**

**STATEMENT OF FACTS AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF  
PETITIONER'S MOTION**

**I.**

**STATEMENT OF FACTS**

The petitioner has been ordered removed from the United States by the respondents. However, because he cannot be removed to his country of origin or any alternate country, he is being held by respondents, based upon their misconstrual of their statutory authority to detain non-removable aliens indefinitely under 8 U.S.C. § 1231(a)(6).

1 Petitioner, a native of China, entered the custody of Respondents over nine months ago, on or about  
2 June 8, 2007, where he has remained since. He was ordered removed from the United States by an  
3 Immigration Judge on October 2, 1995; the Board of Immigration Appeals (BIA) affirmed the decision on  
4 March 24, 1997. He is being held in detention by Respondents based upon their misapplication of 8 U.S.C.  
5 § 1231(a)(6) to indefinitely detain non-removable aliens.

6 The petitioner was born in 1970 in Canton, China. In 1983, at age 13, he left for the United States,  
7 entering as a legal permanent resident under the sponsorship of his grandfather. Petitioner was ordered  
8 removed to China by an immigration judge on October 2, 1995. Petitioner's order of removal became  
9 administratively final as of March 24, 1997, after the BIA dismissed his appeal. See 8 C.F.R. § 1241.1; see  
10 also 8 C.F.R. § 1240.15. Petitioner's removal period commenced as of March 24, 1997. See 8 U.S.C.  
11 § 1231(a)(1)(B) (i). ("The removal period begins on the latest of the following: . . . The date the order of  
12 removal becomes administratively final.").

13 Petitioner was most recently taken from his home into the custody of immigration officials on or  
14 about June 8, 2007, and has remained in their continuous custody for the nine months since. Prior to the  
15 administrative finality of his removal order, Petitioner had previously been taken into custody and released  
16 on bond in or about 1993. Petitioner has been under a final order of removal since March 24, 1997—for  
17 nearly eleven years. In that eleven year period, Respondents have not obtained the travel documents  
18 necessary for his removal.

19 In the nine month period Petitioner has been in their custody to date, Respondents have failed to  
20 conduct the custody review required by regulation, see 8 C.F.R. § 241.4(k)(1)(i), within the 90-day removal  
21 period. See 8 U.S.C. § 1231(a)(1). Instead, on January 23, 2008, seven months after they detained  
22 Petitioner, and over four months after the required review, Respondents issued an order to continue detention  
23 on that date. See Appendix A to the Petition. The order recommended detention on the ground that: "By  
24 the time of your 20th birthday [in 1990] you had already been convicted of four serious felony crimes.  
25 Several years later you were again convicted of three serious felony crimes. You have demonstrated a  
26 flagrant disregard for the laws of the United States as well as for the lives of the general public." Id. The  
27 order made no claim that Petitioner was a flight risk or danger to the community. See id. The order made  
28 no mention of any progress in obtaining travel documents for petitioner. See id. The order further stated

1 that if Petitioner was not “released or removed from the United States by April 14, 2008, jurisdiction of the  
2 custody decision in your case will be transferred to the Headquarters Post Order Unit (HQPDU), 801 I St.  
3 NW, Washington, DC 20536. HQPDU will made a final determination regarding your custody.” Id. To  
4 date, Petitioner has received no further communication regarding his custody status, and does not know  
5 whether HQPDU has made a determination of his status.

6 Over nine months have elapsed since Petitioner was in custody under a final order of removal and  
7 subject to removal. At no time during these past nine months, or in the eleven years since Petitioner’s  
8 removal order was administratively final has the United States government received travel documents that  
9 would permit his repatriation to China. See 8 U.S.C. § 1231(b)(2)(A), (D), (E)(iv)-(vi) (deportable alien  
10 must be removed first to country designated by him at deportation hearing, then to country of citizenship,  
11 then to listed countries, including the country of birth or that country having sovereignty over it at time of  
12 the alien's birth or at time of the deportation.). Neither have Respondents given any indication why, after  
13 eleven years, Petitioner has suddenly been taken from his home into immigration custody. As the Chinese  
14 government has not issued travel documents in the nine months since Petitioner has been subject to a final  
15 order of removal, it is extremely unlikely that its government will issue travel documents to permit his  
16 removal there in the reasonably foreseeable future. Neither have Respondents obtained travel documents  
17 that would permit his removal to any other country. Thus, the United States has had ample opportunities  
18 to obtain travel documents, yet has failed to do so. There is therefore no indication that the petitioner can  
19 removed to China, or any other country, in the reasonably foreseeable future.

20 The respondents continue to hold the petitioner in custody, despite the fact that well over six months  
21 have elapsed. See Zadvydas v. Davis, 533 U.S. 678, 701 (2001) (requiring a court to evaluate whether the  
22 detention of a deportable alien “exceeds a period reasonably necessary to secure removal” and to release an  
23 alien when “it has been determined that there is no significant likelihood of removal in the reasonably  
24 foreseeable future,” after the expiration of a six-month period following the issuance of a final order of  
25 deportation or removal); see also Ma v. Ashcroft, 257 F.3d 1095, 1102 n.5 (9th Cir. 2001) (declaring that  
26 “in Zadvydas, the Supreme Court read the statute to permit a ‘presumptively reasonable’ detention period  
27 of six months after a final order of removal—that is, three months after the statutory removal period has  
28 ended . . .”).

1 The petitioner has less than \$500 in his account at the San Diego Detention Center. See Prison  
 2 Certificate, Form CIV-67, Prison Certificate, attached hereto as Exhibit A. Since he is in custody, he does  
 3 not have a source of income or employment. Petitioner was employed as a waiter at the Wing Hing Chinese  
 4 Restaurant in Philadelphia, Pennsylvania, for four years before he was taken into custody. His monthly  
 5 earnings were approximately \$2,000, which terminated in June 2007 due to his prolonged detention. He has  
 6 no checking, savings or other financial accounts. Petitioner owns a 2001 Honda Civic; he owns no real  
 7 property or any other assets. As a result, he cannot afford to retain counsel.

8 Additionally, petitioner has had no formal legal education or training in the United States or  
 9 anywhere else. See Declaration of Janet Tung in Support of the Petitioner's Motion, ¶ 16. Accordingly,  
 10 the petitioner requests that this Court appoint the Federal Defenders of San Diego, Inc., to represent him in  
 11 the instant habeas action. That office stands ready and able to assist the petitioner in this petition. See id. ¶¶  
 12 2-6.

## 13 II.

### 14 ARGUMENT

#### 15 THIS COURT SHOULD APPOINT COUNSEL FOR THE PETITIONER.

16 Habeas corpus proceedings "are of fundamental importance . . . in our constitutional scheme because  
 17 they directly protect our most valued rights." Brown v. Vasquez, 952 F.2d 1164, 1169 (9th Cir. 1991)  
 18 (quoting Bounds v. Smith, 430 U.S. 817, 827 (1977)) (citations and internal quotations omitted).  
 19 Consequently, federal law permits a district court to appoint counsel in a habeas proceeding under 28 U.S.C.  
 20 § 2241 when the "interests of justice so require," if a petitioner has shown that he is unable to afford an  
 21 attorney. 18 U.S.C. §3006A(a)(2)(B). To make this decision, this Court must "evaluate [1] the likelihood  
 22 of success on the merits as well as [2] the ability of the petitioner to articulate his claims pro se in light of  
 23 the complexity of the legal issues involved." Weygandt v. Look, 718 F.2d 952, 954 (9th Cir. 1983); accord  
 24 Rand v. Rowland, 113 F.3d 1520, 1525 (9th Cir. 1997).

25 As is indicated below, the petitioner is highly likely to succeed on the merits of his claim, but will  
 26 be unable to effectively articulate his claims through a pro se action, in light of his limited educational  
 27 background. See Declaration of Janet Tung, ¶ 16. The petitioner cannot otherwise afford to retain counsel  
 28 for the litigation of his petition for a writ of habeas corpus under 28 U.S.C. § 2241. Thus, the appointment

1 of counsel is appropriate.<sup>2</sup>

2 **The Petitioner Is Highly Likely to Succeed on the Merits of His Claim.**

3 In Zadvydas, the Supreme Court held that 8 U.S.C. § 1231(a)(6) authorizes only a period of detention  
4 that is reasonably necessary to bring about an alien's removal from the United States, and "does not permit  
5 indefinite detention." Zadvydas, 533 U.S. at 689. If a deportable alien has not been released from  
6 immigration custody within a six-month period after the issuance of a final order of removal or deportation,  
7 "the habeas court must ask whether the detention in question exceeds a period reasonably necessary to secure  
8 removal." Id. at 701; see also Ma, 257 F.3d at 1102 n.5 (declaring that "in Zadvydas, the Supreme Court  
9 read the statute to permit a 'presumptively reasonable' detention period of six months after a final order of  
10 removal -- that is, three months after the statutory removal period has ended") (citations omitted). If a  
11 deportable alien "provides good reason to believe that there is no significant likelihood of removal in the  
12 reasonably foreseeable future, the Government must respond with evidence sufficient to rebut that showing."  
13 Zadvydas, 533 U.S. at 701. Federal officials **must** release a deportable alien from custody under appropriate  
14 conditions of supervision when no "significant likelihood of removal [exists] in the reasonably foreseeable  
15 future." Id. at 699-700; see also Ma, 257 F.3d at 1100 (concluding that federal law mandates release of the  
16 alien under 8 U.S.C. § 1231(a)(3) when the alien "has already entered the United States and there is no  
17 reasonable likelihood that a foreign government will accept the alien's return in the reasonably foreseeable  
18 future . . .").

19 The petitioner has been detained in the custody of respondents **since June 8, 2007**. In the time since

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20  
21 <sup>2</sup> In identical habeas proceedings, the Honorable Roger T. Benitez of the United States District Court  
22 for the Southern District of California has appointed the Federal Defenders of San Diego, Inc. as counsel  
23 of record for a similarly-situated petitioner. Casas-Castrillon v. Department of Homeland Security, Case No.  
24 05CV1552-BEN (NLS) (S.D. Cal. Jan. 31, 2006). Likewise, the Honorable Irma E. Gonzalez appointed  
25 counsel in Hanna v. INS, Case No. 01CV0382-IEG (JFS) (S.D. Cal. Apr. 26, 2001). The Honorable  
26 Napoleon A. Jones has appointed the Federal Defenders of San Diego, Inc., based upon the petitioners'  
27 financial eligibility, their likelihood of success on the merits of the habeas petition, the complexity of the  
28 legal issues involved in the habeas action, the petitioners' lack of education and limited proficiency in  
English, and the need for assistance in obtaining discovery from federal immigration officials. See Chaydy  
v. INS, Case No. 00CV1687-J (JAH) (S.D. Cal. Sept. 1, 2000). Other judges in the United States District  
Court for the Southern District of California have made similar appointments. See Aphayavong v. INS, Case  
No. 00CV0804-J (LAB) (S.D. Cal. June 22, 2000); see also Geburu v. INS, Case No. 01CV0625-JM (POR)  
(S.D. Cal. Jul. 11, 2001); Sahagian v. INS, Case No. 01CV066-BTM (RBB) (S.D. Cal. May 18, 2001); Cao  
v. INS, Case No. 00CV1991-L (JAH) (S.D. Cal. Oct. 10, 2000).

1 his order of removal became final on March 24, 1997, the United States government has not received travel  
2 documents that would permit the petitioner's repatriation to China or any alternate country. As the Chinese  
3 government has not issued travel documents in the eleven years since Petitioner has been subject to a final  
4 order of removal, it is extremely unlikely that its government will issue travel documents to permit his  
5 removal there in the reasonably foreseeable future. Neither have Respondents obtained travel documents  
6 that would permit his removal to any other country. The 90-day removal period following the issuance of  
7 a final order of deportation ended on September 6, 2007.

8 The petitioner's detention beyond the presumptively reasonable detention period announced in  
9 Zadvydas violates §1231(a)(6), because it is not significantly likely that the petitioner can be removed to  
10 China or an alternate country in the reasonably foreseeable future. See Zadvydas, 533 U.S. at 700; see also  
11 Ma, 257 F.3d at 1112 (holding that section 1231 mandates the release of deportable aliens "at the end of the  
12 presumptively reasonable detention period" when "there is no repatriation agreement and no demonstration  
13 of a reasonable likelihood that one will be entered into in the near future"). Since there is no evidence that  
14 petitioner will indeed be removed in the reasonably foreseeable future, he is highly likely to succeed on the  
15 merits of his habeas petition. This circumstance, in conjunction with the following elements, suggests the  
16 need for the appointment of counsel.

17 **B. The Petitioner Cannot Adequately Articulate His Claims in the Absence of Counsel, in Light**  
18 **of the Complexity of the Legal Issues Involved in His Petition for Habeas Relief.**

19 To weigh the petitioner's ability to articulate his claims in the absence of counsel, a court must  
20 measure "the [petitioner]'s ability to articulate his claims against the relative complexity of the matter."  
21 Rand, 113 F.3d at 1525. In addition, counsel may be appointed during federal habeas proceedings if the  
22 appointment of an attorney is "necessary for the effective utilization of discovery procedures, . . . [or] if an  
23 evidentiary hearing is required." Weygandt, 718 F.2d at 954 (other internal citations omitted).<sup>3</sup>

24 As is indicated above, the instant case involves complex legal issues grounded in constitutional law,  
25 statutory interpretation, principles of jurisdiction, and administrative procedure. While the Supreme Court's

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26  
27 <sup>3</sup> The Federal Defenders of San Diego, Inc. drafted the instant pleading, as well as the petition for  
28 a writ of habeas corpus. Thus, this Court cannot conclude, based upon these pleadings, that the petitioner  
has a firm grasp of the legal and factual issues involved in federal habeas proceedings.



1 opinion in Zadvydas has clarified many legal issues, several legal issues remain unresolved, including the  
2 determination of acceptable conditions of supervision or release. Moreover, the fact that respondents have  
3 not demonstrated full compliance with the Zadvydas mandate, as of the date of this motion, indicates that  
4 this litigation still remains necessary. See Declaration of Janet Tung, ¶¶ 9-12.

5 Since the petitioner is in the custody of federal immigration officials, moreover, an analysis of  
6 immigration law is required. The Ninth Circuit has declared that “[w]ith only a small degree of hyperbole,  
7 the immigration laws have been deemed second only to the Internal Revenue Code in complexity.” United  
8 States v. Ahumada-Aguilar, 295 F.3d 943, 950 (9th Cir. 2002) (citations and internal quotations omitted).  
9 In most cases involving an immigration law, “[a] lawyer is often the only person who could thread the  
10 labyrinth.” Id. The absence of counsel during immigration proceedings will be prejudicial when an  
11 attorney could have assisted a litigant in seeking relief under applicable immigration laws, statutes, and  
12 cases. Id. at 951-52 (prohibiting the use of a deportation order during a subsequent prosecution for illegal  
13 re-entry because the absence of counsel affected the alien’s ability to ascertain his eligibility for a waiver  
14 of deportation, the viability of a claim of United States citizenship, and his ability to obtain “special  
15 permission” to return to the United States after his deportation).

16 The petitioner’s lack of expertise in legal issues warrants the appointment of counsel. The petitioner  
17 has no post-secondary education in this country, and has never been trained in the practice of law. See  
18 Declaration of Janet Tung, ¶ 16. The absence of any formal legal background or training poses an obstacle  
19 to the petitioner’s understanding of the issues involved in the instant proceedings, and warrants the  
20 appointment of counsel to help him obtain the relief requested in his habeas petition. See Declaration of  
21 Janet Tung, ¶ 16.

22 Additionally, the appointment of counsel may be appropriate during federal habeas proceedings if  
23 it is “necessary for the effective utilization of discovery procedures,...[or] if an evidentiary hearing is  
24 required.” Weygandt, 718 F.2d at 954. The respondents have information and documents relevant to the  
25 petitioner’s habeas petition, including information relating to his criminal history, his bail or parole history,  
26 his institutional history, the content of communications between federal immigration officials and the  
27 embassy of the petitioner’s native country, and other documents relating to his detention by the Bureau of  
28 Immigration and Customs Enforcement.

The petitioner cannot effectively pursue and obtain discovery from respondents that he will need to adequately present his claims without the assistance of counsel, in light of his limited education and lack of familiarity with the legal procedures involved in requesting and obtaining discovery. Moreover, the petitioner cannot adequately review and evaluate his alien registration file (hereinafter "A-file") or evaluate relevant discovery regarding the likelihood of his removal from the United States without the aid of counsel. The need for discovery, too, suggests the need for the appointment of the Federal Defenders of San Diego, Inc. in the instant matter.

**C. The Potential Need for an Evidentiary Hearing Warrants the Appointment of Counsel.**

The Government must proffer evidence "sufficient to rebut [the] showing by a deportable alien that "good reason [exists] to believe that there is no significant likelihood of removal in the reasonably foreseeable future." Zadvydas, 533 U.S. at 701. Since the Government is required to present evidence to rebut the petitioner's contention that his removal to China or an alternate country is not likely in the reasonably foreseeable future, an evidentiary hearing may be necessary to litigate disputed issues of fact. See Lawson v. Borg, 60 F.3d 608, 611 (9th Cir. 1995) (requiring an evidentiary hearing to litigate contested issues of fact during federal habeas proceedings); see also Weygandt, 718 F.2d at 954 (noting that the appointment of counsel may be appropriate during federal habeas proceedings "if an evidentiary hearing is required"). The petitioner lacks a sufficient legal background to advocate for himself during a contested motion hearing. See Declaration of Janet Tung, ¶¶ 16. The appointment of counsel is necessary to ensure that the petitioner's rights are adequately protected in contested habeas proceedings.

**D. The Prison Litigation Reform Act, 28 U.S.C. § 1915, Does Not Require the Petitioner to Pay Filing Fees to Proceed with His Request for Federal Habeas Relief.**

The Prison Litigation Reform Act (PLRA), 28 U.S.C. § 1915, ordinarily requires a prisoner who "brings a civil action or files an appeal in forma pauperis" to "pay the full amount of a filing fee" and to cover subsequent court fees incurred during the litigation of the inmate's claim. 28 U.S.C. § 1915(b). In Naddi v. Hill, however, the Ninth Circuit concluded that "[a] review of the language and intent of the PLRA reveals that Congress was focused on prisoner civil rights and conditions cases, and did not intend to include habeas proceedings in the scope of the Act." 106 F.3d 275, 277 (9th Cir. 1997). Consequently, the Ninth Circuit declined to apply the *in forma pauperis* provisions of the PLRA to habeas petitioners, and to thereby



require habeas petitioners to pay full filing fees and court costs.

The petitioner in the instant case is filing a petition for a writ of habeas corpus under 28 U.S.C. § 2241, along with the instant motion. Since the petitioner is not filing another civil action for relief from the conditions of confinement, such as a civil suit under 42 U.S.C. § 1983, he is not required to pay the full amount and filing fees and court costs to pursue habeas relief. Therefore, this Court cannot dismiss his petition for relief, or otherwise penalize the petitioner, for his failure to pay the full amount of filing fees specified in 28 U.S.C. § 1915.

### III.

## CONCLUSION

For the foregoing reasons, the petitioner respectfully requests that this Court grant the motion for appointment of counsel in this habeas corpus action.

Respectfully submitted,

Dated: 3/15/08

  
SUIHAN CAO  
Petitioner

# **EXHIBIT A**

AID 112

If you are a prisoner you must have an officer from your institution provide this official certificate as to the amount of money in your prison account. There are no exceptions to this requirement.

**PRISON CERTIFICATE**  
(Incarcerated applicants only)  
(To be completed by the institution of incarceration)

I certify that the applicant San Juan CAO  
(NAME OF INMATE)

A# 38494554

(INMATE'S CDC NUMBER)

has the sum of \$ \$ 437.61 on account to his/her credit at

SDCF CCA

(NAME OF INSTITUTION)

I further certify that the applicant has the following securities G

to his/her credit according to the records of the aforementioned institution. I further certify that during

the past six months the applicant's *average monthly balance* was \$ \$ 242.83

and the *average monthly deposits* to the applicant's account was \$ \$ 10.45

ALL PRISONERS **MUST** ATTACH A CERTIFIED COPY OF THEIR TRUST ACCOUNT  
STATEMENT SHOWING TRANSACTIONS FOR THE SIX-MONTH PERIOD  
IMMEDIATELY PRECEDING THE FILING OF THE COMPLAINT PER 28 U.S.C. § 1915(a)(2).

2/19/08

DATE

[Signature]

SIGNATURE OF AUTHORIZED OFFICER OF INSTITUTION

Richard C. Crouch

OFFICER'S FULL NAME (PRINTED)

Business Manager

OFFICER'S TITLE/RANK

## INMATE AVERAGE BALANCE WORKSHEET IM # 38494554 Sun Huan CAO

Beginning Balance 0.00

	DEPOSIT	WITHDRAW	TOTAL	DAILY BALANCE
--	---------	----------	-------	---------------

Aug

31		0.00	0.00	
	0.00	0.00	0.00	0.00
	0.00			

Sep

1		0.00	0.00	
2		0.00	0.00	
3		0.00	0.00	
4		0.00	0.00	
5		0.00	0.00	
6		0.00	0.00	
7		0.00	0.00	
8		0.00	0.00	
9		0.00	0.00	
10		0.00	0.00	
11		0.00	0.00	
12		0.00	0.00	
13		0.00	0.00	
14	200.00	200.00	200.00	
15		0.00	200.00	
16		0.00	200.00	
17		0.00	200.00	
18		0.00	200.00	
19		0.00	200.00	
20		0.00	200.00	
21		-84.93	-84.93	115.07
22		0.00	115.07	
23		0.00	115.07	
24		0.00	115.07	
25		0.00	115.07	
26		0.00	115.07	
27	3.22	-89.06	-85.84	49.23
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	6.77			

2338

7

Oct

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3		0.00	49.23	
4	-48.56	-48.56	2.67	
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21		0.00	152.14	
22	-50.00	-50.00	102.14	
23		0.00	102.14	
24		0.00	102.14	
25	500.00	-5.00	495.00	597.14
26		-83.17	-83.17	513.97
27		0.00	513.97	
28		0.00	513.97	
29		0.00	513.97	
30		0.00	513.97	
31		0.00	513.97	
	700.00	-235.26	4,615.44	148.89
	22.58			

Nov

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3		0.00	402.14	
4		0.00	402.14	
5		0.00	402.14	
6		0.00	402.14	
7		0.00	402.14	

8		0.00	402.14
9	-68.87	-68.87	333.27
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11		0.00	333.27
12		0.00	333.27
13		0.00	333.27
14		0.00	333.27
15		0.00	333.27
16	2.27	-78.66	256.88
17		0.00	256.88
18		0.00	256.88
19	-4.54	-4.54	252.34
20		0.00	252.34
21		0.00	252.34
22	-77.88	-77.88	174.46
23		0.00	174.46
24		0.00	174.46
25		0.00	174.46
26		0.00	174.46
27		0.00	174.46
28		0.00	174.46
29	-69.50	-69.50	104.96
30		0.00	104.96
2.27		-411.28	8,620.64
0.08			287.35

Dec

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4		0.00	104.96
5		0.00	104.96
6	200.00	200.00	304.96
7		0.00	304.96
8		0.00	304.96
9		0.00	304.96
10		0.00	304.96
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12		0.00	304.96
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Jan

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23		0.00	166.54
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25	500.00	500.00	583.42
26		0.00	583.42

27		0.00	563.42	
28		0.00	563.42	
29		0.00	563.42	
30	-67.25	-67.25	496.17	
31		0.00	496.17	
	700.00	-473.53	9,726.31	313.75
	22.58			

Feb

1		0.00	496.17	
2		0.00	496.17	
3		0.00	496.17	
4		0.00	496.17	
5		0.00	496.17	
6	-33.95	-33.95	462.22	
7		0.00	462.22	
8		0.00	462.22	
9		0.00	462.22	
10		0.00	462.22	
11		0.00	462.22	
12		0.00	462.22	
13	-27.61	-27.61	434.61	
14		0.00	434.61	
15		0.00	434.61	
16		0.00	434.61	
17		0.00	434.61	
18	3.00	3.00	437.61	
19		0.00	437.61	
	3.00	-61.56	8,764.66	461.30
	0.16			

Balance	Days 173	42,009.77	
average		<b>242.83</b>	
Deposit	Days 173	1,808.49	
average		<b>10.45</b>	